

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

ASSOCIATION OF NEW JERSEY RIFLE
& PISTOL CLUBS, INC., BLAKE
ELLMAN, and MARC WEINBERG,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official
capacity as Attorney General of New Jersey,
PATRICK J. CALLAHAN, in his official
capacity as Superintendent of the New
Jersey Division of State Police,
RYAN MCNAMEE, in his official capacity
as Chief of Police of the Chester Police
Department, and
JOSEPH MADDEN, in his official capacity
as Chief of Police of the Park Ridge Police
Department,

Defendants.

HON. RENÉE M. BUMB

Civil Action No.
3:18-cv-10507

(ELECTRONICALLY FILED)

**NOTICE OF EMERGENCY
MOTION FOR EXTENSION OF
STAY PENDING APPEAL**

AND

**FOR 15-DAY ADMINISTRATIVE
EXTENSION OF STAY**

MARK CHEESEMAN, TIMOTHY
CONNELLY, and FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Acting Attorney
General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity
as Superintendent of the New Jersey

HON. RENÉE M. BUMB

Civil Action No.
1:22-cv-4360

State Police, CHRISTINE A. HOFFMAN, in her official capacity as Acting Gloucester County Prosecutor, and BRADLEY D. BILLHIMER, in his official capacity as Ocean County Prosecutor,

Defendants.

BLAKE ELLMAN, THOMAS R. ROGERS, and ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official capacity as Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police, LT. RYAN MCNAMEE, in his official capacity as Officer in Charge of the Chester Police Department, and KENNETH BROWN, JR., in his official capacity as Chief of the Wall Township Police Department,

Defendants.

HON. RENÉE M. BUMB

Civil Action No.
3:22-cv-04397

TO: Clerk of Court, United States District Court
District of New Jersey – Camden Vicinage
4th & Cooper Streets
Camden, New Jersey 08101

All counsel of record (via CM/ECF)

PLEASE TAKE NOTICE that Matthew J. Platkin, Attorney General of the State of New Jersey, by Deputy Solicitor General Angela Cai, appearing on behalf of Defendants, Matthew J. Platkin, Patrick J. Callahan, Elizabeth Parvin,¹ and Bradley D. Billhimer (collectively, “State Defendants”), move before the United States District Court for the District of New Jersey for an extension of the current 30-day stay of the District Court’s July 30, 2024 Memorandum Opinion and Order (*Cheeseman v. Platkin*, 22-cv-4360: ECF Nos. 80 & 81; *Ellman v. Platkin*, 22-cv-4397: ECF Nos. 62 & 63), until the resolution of any appeal. The State also moves for a 15-day administrative extension of the Stay entered on July 30, 2024.

PLEASE TAKE NOTICE that the undersigned will rely on the attached Brief in support of the motion. A proposed form of Order for both the Stay Pending Appeal and Administrative Extension of Stay are attached hereto.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW
JERSEY

By: /s/ Angela Cai
Angela Cai
Deputy Solicitor General

Dated: August 13, 2024

¹ The State requests that the caption be substituted automatically pursuant to Fed. R. Civ. P. 25(d). Former Acting Gloucester County Prosecutor Christine Hoffman retired on July 1, 2024. *See* AG Platkin Appoints Leader of DCJ’s Human Trafficking Unit as Acting Gloucester County Prosecutor, (May 30, 2024), <https://www.njoag.gov/ag-platkin-appoints-leader-of-dcjs-human-trafficking-unit-as-acting-gloucester-county-prosecutor/>.